

UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF NEW YORK

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PLUMBERS' & PIPEFITTERS' LOCAL #562 :  
SUPPLEMENTAL PLAN & TRUST, et al., :  
Plaintiffs, : No. 08 Civ. 1713 (ERK) (WDW)  
: v. :  
J.P. MORGAN ACCEPTANCE CORPORATION I, :  
et al., :  
Defendants. :  
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PUBLIC EMPLOYEES' RETIREMENT SYSTEM :  
OF MISSISSIPPI, : No. 09 Civ. 3209 (ERK)  
Plaintiff, :  
v. :  
MOODY'S INVESTORS SERVICE, INC., et al, :  
Defendants :  
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**STIPULATION AND [PROPOSED] ORDER**

**WHEREAS**, on March 26, 2008, a putative securities class action, entitled *Plumbers' & Pipefitters' Local #562 Supplemental Plan & Trust, et al. v. J.P. Morgan Acceptance Corp. I, et al.*, was filed in the Supreme Court of the State of New York, County of Nassau and removed to the United States District Court for the Eastern District of New York on April 25, 2008;

**WHEREAS**, on July 24, 2009, a putative securities class action, entitled *Public Employees' Retirement System of Mississippi v. Moody's Investors Service, Inc., et al.*, was filed in this Court and a Notice of Related Case was filed in the earlier filed action on the same date;

**WHEREAS**, on October 21, 2009, this Court entered an order granting a motion to consolidate these cases;

**WHEREAS**, on November 24, 2009, this Court entered an order adopting Magistrate Judge Wall's report and recommendation appointing Public Employees' Retirement System of Mississippi as lead plaintiff ("Lead Plaintiff") and appointing Wolf Popper LLP and Bernstein Litowitz Berger & Grossmann LLP as Lead Counsel;

**WHEREAS**, Lead Plaintiff alleges that the consolidated action pertains to securities issued by 33 separate trusts, which offered securities pursuant to two registration statements, four prospectuses and 33 prospectus supplements. Lead Plaintiff further alleges that these securities are collateralized by home mortgage loans originated by at least 19 different financial institutions. Lead Plaintiff also alleges that the securities were rated by at least one of defendants Moody's Investors Service, Inc., Fitch Group, Inc., or The McGraw-Hill Companies, Inc.;

**WHEREAS**, the parties have met and conferred, and given the number and complexity of securities and issues to be addressed in the pleadings, have agreed to the schedule set forth below.

**IT IS HEREBY STIPULATED AND AGREED**, by and between the undersigned counsel for Lead Plaintiff and Defendants J.P. Morgan Acceptance Corporation I, J.P. Morgan Securities Inc., David M. Duzyk, Louis Schioppo, Jr., Christine E. Cole, Edwin F. McMichael, Moody's Investors Service, Inc., Fitch Group, Inc., and The McGraw-Hill Companies, Inc. (collectively, the "Stipulating Defendants") that:

1. No defendant shall have any obligation to respond to the initial complaints filed in the above-captioned cases;
2. Lead Plaintiff will file and serve a Consolidated Amended Complaint on or before March 8, 2010;

3. Stipulating Defendants shall answer, move, or otherwise respond to the Consolidated Amended Complaint on or before May 7, 2010;
4. If motions to dismiss are filed, Lead Plaintiff shall file opposition papers on or before June 21, 2010 and Stipulating Defendants shall file reply papers on or before July 21, 2010.

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SO ORDERED:

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United States District Judge